

**TIMELINE OF ISSUES RELATED TO ADI PRODUCTION**

<b>Date/Topic</b>	<b>Description</b>
Nov. 25, 2019	Plaintiffs' 2nd Set of Requests for Production to Facebook (No. 19). Joint Decl., Ex. 10.
Apr. 2020	First raised to the Court (ECF No. 413, Joint Status Report at 4–5).
Feb. 2020 – Mar. 2021	At least 17 Meet and Confers during this time. <ol style="list-style-type: none"> <li>1. Meet &amp; Confer (Feb. 8, 2020)</li> <li>2. Meet &amp; Confer (Feb. 14, 2020)</li> <li>3. Meet &amp; Confer (April 8, 2020)</li> <li>4. Meet &amp; Confer (July 2, 2020)</li> <li>5. Plaintiffs provide Facebook with Proposed Stipulation (July 22, 2020)</li> <li>6. Facebook provide Plaintiffs with Counterproposal Stipulation (Aug. 31, 2020)</li> <li>7. Meet &amp; Confer (Sept. 3, 2020)</li> <li>8. Meet &amp; Confer (Sept. 10, 2020)</li> <li>9. Meet &amp; Confer (Sept. 22, 2020)</li> <li>10. Meet &amp; Confer (Sept. 24, 2020)</li> <li>11. Meet &amp; Confer (Nov. 12, 2020)</li> <li>12. Meet &amp; Confer (Dec. 17, 2020)</li> <li>13. Meet &amp; Confer (Jan. 5, 2021) (re: briefing schedule)</li> <li>14. Meet &amp; Confer (Feb. 4, 2021)</li> <li>15. Meet &amp; Confer (Feb. 11, 2021)</li> <li>16. Meet &amp; Confer (Mar. 9, 2021)</li> <li>17. Meet &amp; Confer (Mar. 15, 2021)</li> </ol>
Summer 2021 – Early 2022	At least 4 more Meet and Confers during this time. <ol style="list-style-type: none"> <li>1. June 25, 2021</li> <li>2. October 14, 2021 (one month after Plaintiffs first requested)</li> <li>3. March 16, 2022</li> <li>4. March 27, 2022</li> </ol>
<b>Total Meet and Confers = At least 21</b>	
Briefs	8 Total Briefs (7 briefs, one 10-page, 27-paragraph Southwell Declaration)
Orders	<ol style="list-style-type: none"> <li>1. Discovery Order No. 12 (Jan. 15, 2021)</li> <li>2. Further Order Re: ADI Privilege Dispute (July 26, 2021)</li> <li>3. Order Granting Mot. to Compel ADI Materials (Sept. 8, 2021)</li> <li>4. Special Master Order re: Rolling Production of ADI Materials (Dec. 15, 2021)</li> <li>5. Special Master Amended Order re: Production of ADI Materials (Dec. 22, 2021)</li> </ol>

**TIMELINE OF ISSUES RELATED TO ADI PRODUCTION**

<b>Date/Topic</b>	<b>Description</b>
	6. Order on Appeal re: ADI Order (Jan. 12, 2022)
June 2022	ADI production finally complete (~32 months after Plaintiffs first requested)